

UNITED STATES DEPARTMENT OF THE INTERIOR
MINERALS MANAGEMENT SERVICE

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January 23, 1998

NOTICE TO LESSEES AND OPERATORS OF FEDERAL OIL, GAS, AND SULPHUR
LEASES IN THE OUTER CONTINENTAL SHELF

Minerals Management Service (MMS) Guidance Regarding American Petroleum Institute (API) Specification 14A, "Specification for Subsurface Safety Valve Equipment," Ninth Edition (July 1, 1994) and Supplement 1

On December 15, 1997, the API Specification 14A Revisions and Corrections Task Group (Task Group), chartered by the API Subcommittee on Valves and Wellheads (API C1/SC6), issued a Supplement to API Specification 14A, Ninth Edition, July 1, 1994. Supplement 1 deleted the 3-year requalification testing requirement for subsurface safety valves (SSSVs), strengthened guidelines for equipment changes that affect requalification testing, and added new definitions to clarify the revised design change language. Supplement 1 also included editorial corrections previously published in a September 19, 1996, errata sheet.

Prior to issuing Supplement 1, the API Task Group reviewed current and past editions of API Specification 14A. Based on their review, the Task Group concluded that improvements in the SSSV testing program adopted in past editions of Specification 14A left no technical justification for continuation of the 3-year requalification testing requirement.

Paragraph 7.2.2 of API Specification 14A, Ninth Edition, July 1, 1994, requires that "(T)he Manufacturer shall submit a SSSV of most recent manufacture for Verification Testing. Such testing shall qualify SSSVs of the same size, type and model as the tested SSSV which are manufactured during the three year period subsequent to the date the Verification Test form is approved by the Test Agency." Accordingly, 3 years after a SSSV passes the verification test the manufacturer is again required to submit the SSSV for verification testing, i.e. requalification testing.

The Task Group noted that the numerous improvements in the verification test that were incorporated in past editions of API Specification 14A resulted in significant improvement in the testing success rates. An independent testing agency reported that failures for all SSSV tests were 11 percent in 1995 and 10 percent in 1996, whereas a 28 percent failure rate for all requalification tests were reported for the period 1972 through 1994. A majority of the Task Group thus concluded that the 3-year requalification testing requirement has become an unnecessary redundancy.

The MMS is not in agreement with the removal of the requalification testing requirement from API Specification 14A, Ninth Edition, as included in Supplement 1. The MMS regulations (30 CFR 250.1) allow a lessee to use a later edition of a specific document incorporated by reference provided (1) that the lessee demonstrates that compliance with the later edition provides a degree

of protection, safety, or performance equal to or better than that which would be achieved by compliance with the listed edition and (2) that the lessee obtains prior written approval of the authorized MMS official. The MMS does not believe that adoption of Supplement 1, published on December 15, 1997, provides for performance equal to or better than that which would be achieved by compliance with the edition referenced in 30 CFR . The Ninth Edition of API Specification 14A, "Specification for Subsurface Safety Valve Equipment" (dated July 1, 1994), that was incorporated by reference into 30 CFR 250 when the MMS issued the Federal Register Notice of November 26, 1996 (FR, Vol. 61, No.229, Pages 60019-26), will continue to be part of MMS regulations. Supplement 1 will not be incorporated by reference into MMS regulations.

This Notice to Lessees and Operators refers to information collection requirements in 30 CFR 250, Subparts A and H. The Office of Management and Budget has approved the collection of information in these regulations and has assigned OMB Control Numbers 1010-0030 and 1010-0059, respectively. This Notice to Lessees and Operators does not impose additional information collection requirements subject to the Paperwork Reduction Act of 1995.

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